

BEFORE THE PUBLIC SERVICE COMMISSION IN  
THE COMMONWEALTH OF KENTUCKY

RECEIVED

MAR 19 2026

PUBLIC SERVICE  
COMMISSION

In the Matter of:

TERRI LEMASTER

COMPLAINANT

V.

CASE NO.

2025-00256

MOUNTAIN WATER DISTRICT

DEFENDANT

AMENDED COMPLAINT

Affidavits:

The three attached affidavits state my water meter was next to Dickie Smith's water meter and two of the three affidavits belonging to Dickie Smith and Ruthann Smith state they were told by a Mountain Water District employee that water meters had been moved and raised on Ms. LeMaster's property and that water lines had also been dug. Ms. LeMaster's affidavit states she saw workers dig on her property who identified themselves as contractors for Mountain Water District and that they were out of Tennessee. They actually dug a line from the bottom of the hill up to a mobile home and busted a section of Ms. LeMaster's driveway running a line to the mobile home owned by Ellis Randall & Darlene Hager. All the digging was on Ms. LeMaster's property without her permission. Ms. LeMaster was told Randy Hager called in to raise a meter that is on Ms. LeMaster's property in 2017. Ms. LeMaster saw workers believed to be with Mountain Water at the location where the water meter is with a small piece of equipment that had a scoop on it approximately two years ago and it is believed that is when the meters were moved for the second time. Ms. LeMaster's water meter was under a tree on the other side of the yard at the bottom of the hill when she purchased the property in 2003 and at some point someone had Mountain Water move the water meter to the other side of the yard at the bottom of the hill. Ms. LeMaster would often not be at the home during the day and it is a bit of a distance from Ms. LeMaster's home at the top of the hill to the bottom of the hill where the water meter is located which allowed moving the water meter, raising a meter and digging lines on her property without her knowledge or permission.

GPS Coordinates:

Exhibit Y says 22 Varney Road is 37 37 43.4N 82 15 38.2W, 37.628720 -82.260616 is a document given to Ms. LeMaster by Kevin Lowe with Mountain Water. Exhibit Y1 has the same longitude & latitude location number for 36 Varney Road Belfry KY 41514 as does Exhibit Y for 22 Varney Road Belfry KY 41514. These documents were given to me by Kevin Lowe at Mountain Water. Exhibit Z is a document given to Ms. LeMaster stating a different longitude & latitude location for 22 Varney Road Belfry, KY 41514 of 37.6282513 -822598268.

**Barrel Colors & number of water meters:**

Exhibit labeled Z1 is of Mr. Keathley with the sewer division of Mountain Water who was sent by Mountain Water to address my concerns. You see Mr. Keathley in the photo with a meter that has a black barrell. Mr. Keathley stated there were not two water meters side by side but only the one as only one was evident. Whether the second barrell had been covered up and then later uncovered I don't know but I do know as the other affidavits state that there were two water meters side by side for over a decade belonging to Ms. LeMaster and Dickie Smith. Sometime after 2003 the three water meters that had been located under a tree were moved without Ms. LeMaster's permission or knowledge. The black barrel in the photo with Mr. Keathley (Exhibit Z1) who says the black barrel is Ms. LeMaster's water meter but in Exhibit Z2 photo the white barrel is what is now Ms. LeMaster's meter.

**Mountain Water Failed to Verify Identity:**

Mountain Water failed to identify the identity of person requesting the water meter being moved and before raising a meter and digging and running a line. Failing to require proof of identity and proof of ownership of property is the reason this issue has occurred. Ms. LeMaster was told Randall "Randy" Hager called in and requested the work be done and it is believed that Randy Hager has a connection to Mountain Water. Exhibit Z3 is a Work Order 71556 even states "Randy, the final reading on the meter was ..." and has location tag number 308-00090 which is a different location number and that location number shows on other forms provided by Mountain Water District.

On Exhibit Z4 Mountain Water redacted the account number and customer number but shows location number 0308-02700 which is a different number than is listed on work orders.

**Cover-Up:**

There are two Mountain Water work order 237671 both with the same date of 12-22-2020 but one states Exhibit Z5 "Also can see of the neighbor hooked his line up into her base with a tee" duplicate work order Exhibit Z6 has the statement of the neighbor hooking his line into Ms. LeMaster's base is marked out. Also, exhibit 7 says "status one-three working" indicating more than one meter on Ms. LeMaster's account.

**Commission Finds Mountain Water District Be Required To Answer The Allegation Of Mountain Water District's relocation Of Meter:**

Mountain Water should have to state all work they did or contracted out regarding moving of my water meter and other water meters on my property as well as raising water meters and digging lines and unredacting account and customer numbers on exhibit as well as provide maps from 2003 and before and after showing locations of meters and owners name.

Sincerely,

Terrj LeMaster



P.O. Box 612 Belfry, KY 41514

606-625-6006

Google Maps

37°37'43.4"N 82°15'38.2"W



Imagery ©2025 Airbus, Maxar Technologies, Map data ©2025 Google 50 ft



22 Varney  
 ↑ Exhibit Y

37°37'43.4"N 82°15'38.2"W

37.628720, -82.260616

-   
 Directions
-   
 Save
-   
 Nearby
-   
 Send to phone
-   
 Share

Same GPS coordinates as 2/2020 when current meter was installed  
 Same meter as 2/2020 today

JPHQ+FGJ Belfry, Kentucky

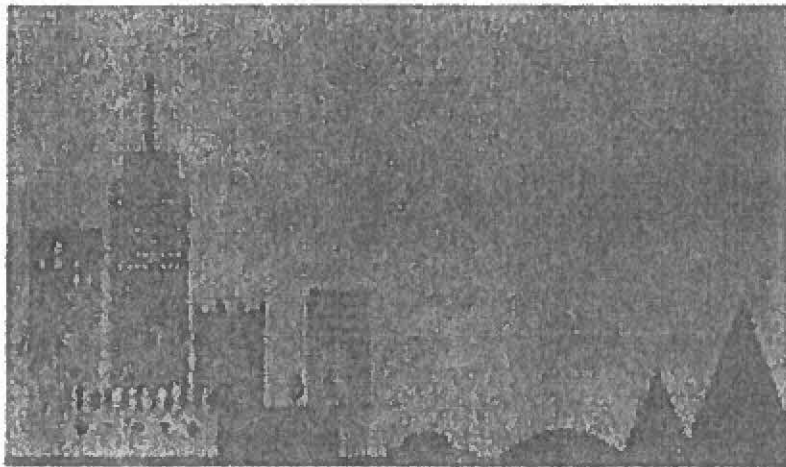
Exhibit Y

Google Maps

37°37'43.4"N 82°15'38.3"W



Imagery ©2025 Airbus, Maxar Technologies, Map data ©2025 Google 50ft



36 Vanney Rd



↑ Exhibit 1

37°37'43.4"N 82°15'38.3"W

37.628720, -82.260630

same gps coordinates that it had in 7/2019 when we began collecting them

same meter as 7/2019

-   
Directions
-   
Save
-   
Nearby
-   
Send to phone
-   
Share

+FPQ Belfry, Kentucky

Exhibit 1



22 Varney Rd, Belfry, KY 41514

Location: 37.6282513, -82.2598268



Exhibit Z

Exhibit 21

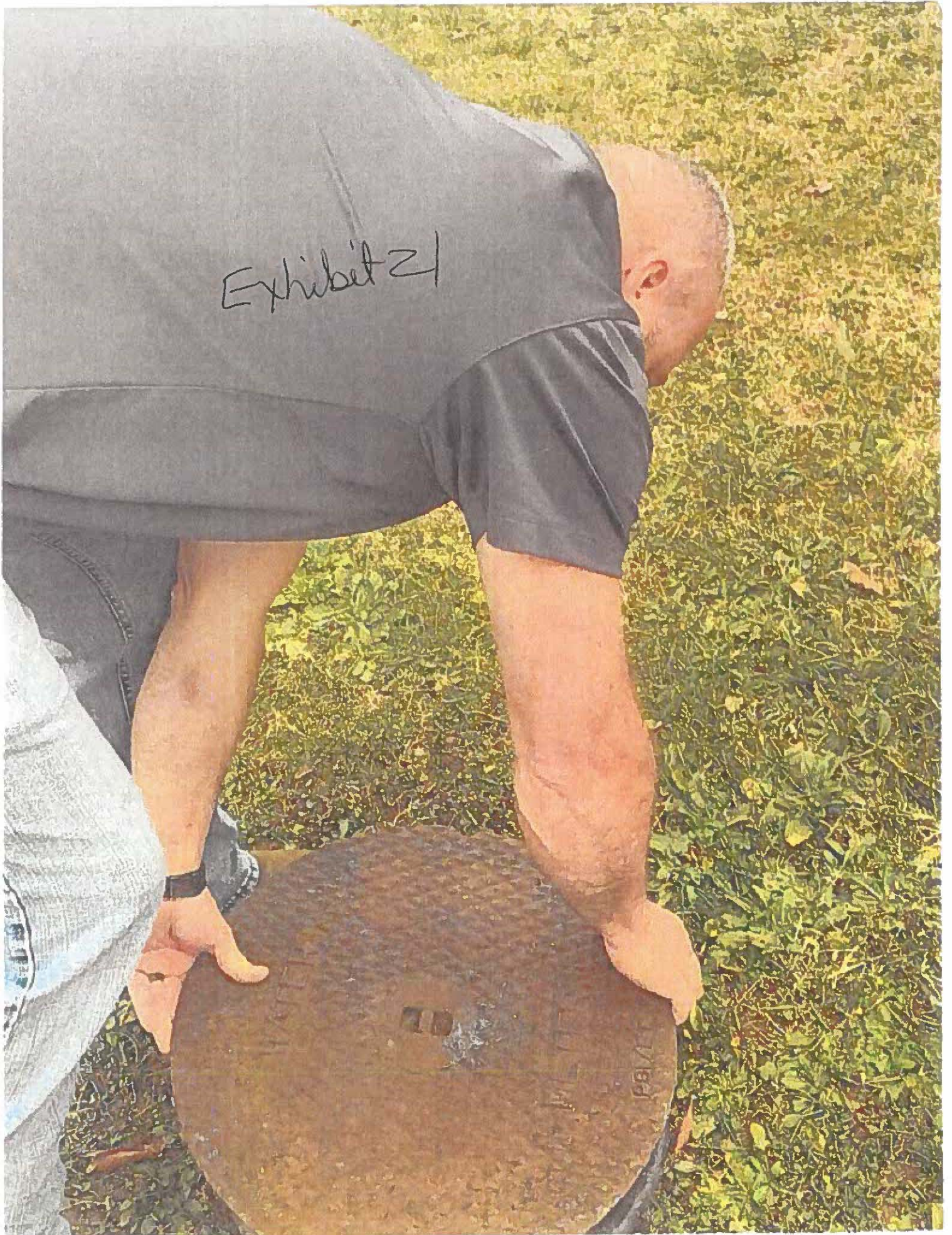




Exhibit  
22

Mountain Water District  
**WORK ORDER 71556**

Account # [REDACTED]  
Name Lemaster, Terri  
Address 22 Churchhouse Hollow McAndrews, KY 41543  
Telephone [REDACTED] Job#

Order Date 10/20/2011  
Status TODAY  
Scheduled 10/20/11 04:02 PM  
Order Type RECONNECT WATER

METER#	ERT/INTERNAL ID#	READING	LOCATOR TAG	READING IN/ OUT
WT29217669	70132533	30170	308-00090	

Description  
Comment

Requested By SM Assigned To FIELD CUSTOMER Completed By AS 10-28-11 SILENA MCKINNEY  
Start Date 10/20/11 04:00 PM Completed Date 10/20/11 04:15 PM

Notes UNLOCKED LEFT OFF  
READING ?

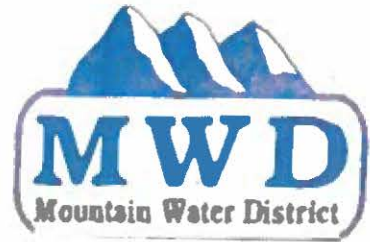
		Comments
Total Employee Cost	\$5.16	
Total Equipment Cost	\$3.36	
Total Inventory Cost	\$0.00	
Miscellaneous Costs	\$0.00	
Total Order Cost	\$8.52	

10-27-11  
Randy.  
Reading → → Per wo # 71414,  
the final  
reading on the  
meter was  
30256.  
RM

Exhibit 23

**MOUNTAIN WATER DISTRICT**

P.O. Box 3157  
Pikeville, KY 41502



Account Number: [REDACTED]  
Customer Name: LEMASTER, TERRI  
Payment Type: CASH  
Payment Received: 4/4/2025 1:53 PM  
Received By: DANIELLE WHITE

Location Number: 0308-02700  
Address: 22 Varney Rd \$728.48

Subtotal: \$728.48  
Tendered: \$30.00  
Paid: \$30.00  
Change Due: \$0.00  
  
Updated Balance: \$698.48

0035189

Mountain Water District  
Cust Acc #: [REDACTED]  
03/13/17 14:24 148530  
Amount Received: \$50.00  
Payment Type: Cash  
Operator: Janet  
  
CSIE DESCRIPTION AMOUNT  
CPE Paid At Office 47.46

Exhibit 24

**MOUNTAIN WATER DISTRICT**

P.O. Box 3157  
Pikeville, KY 41502

Account Number: [REDACTED]  
Customer Name: LEMASTER, TERRI  
Payment Type: CASH  
Payment Received: 4/4/2025 1:53 PM  
Received By: DANIELLE WHITE

Location Number: 0308-02700  
Address: 22 Varney Rd Pikeville, KY 41502 \$115.00

Subtotal: \$115.00  
Tendered: \$30.00  
Paid: \$30.00  
Change Due: \$0.00  
  
Updated Balance: \$85.00

0035189

Mountain Water District  
**WORK ORDER 237671**

Account# [REDACTED]  
Name [REDACTED] (master, Yerr)  
Address 22 Varney Rd -Churchhse Hol Mc Andrews, KY 41543  
Telephone [REDACTED] Job #

Order Date 12/22/2020  
Status VOID  
Scheduled 12/22/20 09:48 AM  
Order Type LOW PRESSURE

METER# WT 52267084      ERT/INTERNAL ID# 400309688      READING 1118      LOCATOR TAG 308-00090      READING IN / OUT

Description ALSO CAN SEE OF THE NEIGHBOR HOOKED HIS LINE UP INTO HER BASE WITH A TEE

Comment

Requested By SM      Assigned To FIELD CUSTOMER      Completed By SILENA MCCOWN  
Start Date 12/22/20 10:09 AM      Completed Date 12/22/20 10:09 AM

Notes SEE WO # 237670  
VOID



Total Employee Cost	\$0.00	Comments
Total Equipment Cost	\$0.00	
Total Inventory Cost	\$0.00	
Miscellaneous Costs	\$0.00	
Total Order Cost	\$0.00	

Exhibit 25

Signature \_\_\_\_\_



Mountain Water District  
**WORK ORDER 155340**

Account# [REDACTED]  
 Name Lemaster, Terri  
 Address 22 Varney Rd -Churchhse Hol Mc Andrews, KY 41543  
 Telephone [REDACTED] Job#

Order Date 6/22/2016  
 Status ONE - THREE WORKING  
 Scheduled 06/22/16 08:33 AM  
 Order Type METER TAMPERED



METER# WT 48004992      ERT/INTERNAL ID# 86650095      READING 40632      LOCATOR TAG 308-00090      READING IN / OUT

Description  
 Comment

Requested By rh      Assigned To FIELD CUSTOMER      Completed By MELISSAWATSON  
 Start Date 06/23/16 12:30 PM      Completed Date 06/23/16 12:45 PM

Notes NEW METER#48004992 TAG# 86650095 READING 0 OLD METER# 19158403 TAG# 70253558 READING 40669

Total Employee Cost \$3.47  
 Total Equipment Cost \$4.48  
 Total Inventory Cost \$151.20  
 Miscellaneous Costs \$0.00  
 Total Order Cost \$159.15

*B 6-29-16*

*B 6-29-16*

Inventory Item	Unit Of Measure	Quantity Ordered	Quantity Used	Item Cost	Total Cost
34RADIOREGI 3/4" RADIOREGISTER (ORION)	EA EACH	1	1	\$151.00	\$151.00
34MG 3/4" METER GASKET	EA EACH	2	2	\$0.10	\$0.20

*Exhibit B Exhibit 7*

AFFIDAVIT

The affiant, Daniel Roer, first being duly sworn, states as follows:

I am over the age of 18 years of age and reside at 90 Varney Road Belfry Kentucky 41514.

I am of sound mind and competent to make this affidavit of the facts herein.

The statement/evidence herein affidavit is within my personal knowledge and I swear and attest the statement/evidence in this affidavit is true and correct.

In 2022 I worked for Lee Dotson dry walling over a window of a mobile home on Varney Road Belfry, KY. The mobile home looks like a house from the outside. Lee Dotson added on to the mobile home to make it larger. The address on the mail box near the mobile home currently says "#36"

In December 2022 and January 2023 I had to briefly turn off the water at Ms. LeMaster's house. Dickie Smith showed me which watermeter went to Ms. LeMaster's house as it was beside his and he was concerned I would turn off his water by mistake. The water meter that went to Ms. LeMaster's house was one of two water meters that were side by side belonging to Dickie Smith and Terri LeMaster

FURTHER AFFIANT SAYETH NAUGHT

VERIFICATION

I, Daniel Roer, hereby swear and affirm the facts stated herein are true and accurate and within my personal knowledge.

Daniel Roer

DANIEL ROER, AFFIANT

6-28-25

DATE

COMMONWEALTH OF KENTUCKY

COUNTY OF PIKE

The foregoing instrument was subscribed, sworn to and acknowledged before me this

28<sup>th</sup> day of June 2025, by Daniel Roer.

Monae Full

Notary Public Signature

6/28/25

DATE

My commission expires 8/13/25

Notary ID: KY NP 35017

Exhibit 28

AFFIDAVIT

The affiant, Daniel Roer, first being duly sworn, states as follows:

I am over the age of 18 years of age and reside at 90 Varney Road Belfry Kentucky 41514.

I am of sound mind and competent to make this affidavit of the facts herein.

The statement/evidence herein affidavit is within my personal knowledge and I swear and attest the statement/evidence in this affidavit is true and correct.

On June 18, 2025, I inspected under Ms. LeMaster's house to determine if there was a leak. Ms. LeMaster's house is located at physical address 22 Varney Road Belfry KY 41514. There was not a leak under Ms. LeMaster's house. Under the house was dry. I also inspected inside the house and there was not a leak.

FURTHER AFFIANT SAYETH NAUGHT

VERIFICATION

I, Daniel Roer, hereby swear and affirm the facts stated herein are true and accurate and within my personal knowledge.

Daniel Roer  
DANIEL ROER, AFFIANT  
6-26-25  
DATE

COMMONWEALTH OF KENTUCKY  
COUNTY OF PIKE

The foregoing instrument was subscribed, sworn to and acknowledged before me this 26<sup>th</sup> day of June 2025, by Daniel Roer.

Melissa D. Bledwell  
Notary Public Signature  
6/26/2025  
DATE

My commission expires 8/13/25  
Notary ID: 35015

Exhibit 29

**AFFADAVIT**

The affiant, Dickie Smith, first being duly sworn, states as follows;

I am over the age of 18 years of age and reside at 74 Varney Road Belfry Ky 41514.

I am of sound mind and competent to make this affidavit of the facts herein.

The statement/evidence herein affidavit is within my personal knowledge and I swear and attest the statement/evidence in this affidavit is true and correct.

In 2001 Runyon Real Estate agent Leslie Hatfield showed me the property boundary lines for adjoining property which was then owned by Olivene Varney who was a widow to Harold T. Varney. Olivene Varney sold the property to Terri LeMaster in 2003. The bottom behind the house the Barkers now reside was owned by Olivene Varney and is part of the property sold to Terri LeMaster in 2003 per boundary line conversation with the real estate agent, Mr. Hatfield.

For close to two decades the water meters for Dickie Smith and Terri LeMaster were side by side. Dickie Smith's water meter was on the left of Ms. LeMaster's water meter if standing with back to road. I spoke with the employee of Mountain Water who was in a truck which the truck said Mountain Water on it and he confirmed water meters and water lines had been moved, raised and installed on Ms. LeMaster's property.

FURTHER AFFIANT SAYETH NAUGHT

**VERIFICATION**

I, Dickie Smith, hereby swear and affirm the facts stated herein are true and accurate and within my personal knowledge.

Dickie Smith  
Dickie Smith, Affiant

03/15/2025  
Date

COMMONWEALTH OF KENTUCKY

COUNTY OF PIKE

The foregoing instrument was subscribed, sworn to and acknowledged before me this \_\_\_ Day of March 2025, by Dickie Smith.

Kystal Jackett  
Notary Public Signature

3/15/2025  
Date

My commission expires 6/4/2028  
Notary ID: KY NP 89002

Exhibit 2/10

**AFFADAVIT**

The affiant, Ruthann Smith, first being duly sworn, states as follows;

I am over the age of 18 years of age and reside at 74 Varney Road Belfry Ky 41514.

I am of sound mind and competent to make this affidavit of the facts herein.

The statement/evidence herein affidavit is within my personal knowledge and I swear and attest the statement/evidence in this affidavit is true and correct.


In 2001 Runyon Real Estate agent Leslie Hatfield showed me the property boundary lines for adjoining property which was then owned by Olivene Varney who was a widow to Harold T. Varney. Olivene Varney sold the property to Terri LeMaster in 2003. The bottom behind the house the Barkers now reside was owned by Olivene Varney and is part of the property sold to Terri LeMaster in 2003 per boundary line conversation with the real estate agent, Mr. Hatfield.

For close to two decades the water meters for Dickie Smith and Terri LeMaster were side by side. Dickie Smith's water meter was on the left of Ms. LeMaster's water meter if standing with back to road. My husband, Dickie Smith, spoke to an employee of Mountain Water who was in a truck on Varney Road in Belfry Kentucky a few years ago and the truck said Mountain Water on it and the Mountain Water employee confirmed water meters and water lines had been moved, raised and installed on Ms. LeMaster's property.

FURTHER AFFIANT SAYETH NAUGHT

**VERIFICATION**

I, Ruthann Smith, hereby swear and affirm the facts stated herein are true and accurate and within my personal knowledge.

  
Ruthann Smith, Affiant  
03-19-2025  
Date

COMMONWEALTH OF KENTUCKY

COUNTY OF PIKE

The foregoing instrument was subscribed, sworn to and acknowledged before me this \_\_\_ day of March 2025, by Ruthann Smith.

  
Notary Public Signature

3/18/2025  
Date

My commission expires 6/4/2028  
Notary ID: KYND 89002

Exhibit 